

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

STRUDEL HOLDINGS LLC and AVR AH LLC,

Debtors.¹

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Chapter 11

Case No. 23-90757 (CML)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE
OF BEYOND THE BEACH, LLC**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, each of the undersigned counsel hereby appears on behalf of Beyond the Beach, LLC (the “Beyond the Beach”)², and requests copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on Beyond the Beach by and through their counsel as follows:

Michael D. Warner, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
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¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The location of the Debtors’ corporate headquarters and the Debtors’ service address is: PO Box 4068, Aspen, CO 81612.

² On September 8, 2023, the undersigned counsel filed a Notice of Appearance [Docket No. 103] (the “Initial NOA”) on behalf of Seth and Jodi Brufsky (together, the “Brufskys”), who are the indirect and ultimate equity owners of Beyond the Beach. The Brufskys’ interest in these chapter 11 cases exists solely through Beyond the Beach. The Brufskys are therefore insiders and/or affiliates of Beyond the Beach as contemplated by section 101 of Title 11 of the United States Code, and are not required to file any statement under Bankruptcy Rule 2019. This Notice of Appearance correspondingly amends the Initial NOA

PLEASE TAKE FURTHER NOTICE that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in these cases, and (iv) every pleading or report filed in these cases, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of Beyond the Beach to (1) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: September 20, 2023

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES, LLP

/s/ Michael D. Warner

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Counsel to Beyond the Beach, LLC

CERTIFICATE OF SERVICE

I certify that on September 20, 2023, a true and correct copy of the foregoing Notice of Appearance was served by this court's CM/ECF to all parties that are registered to receive such notice in the above cases.

/s/ Michael D. Warner

Michael D. Warner